

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Engineered Polymer Solutions, Inc.
d/b/a Valspar Coatings
Attn: Tina Levitt
1191 South Wheeling Road
Wheeling, Illinois 60090

Application No.: 09010025

I.D. No.: 031324ACO

Applicant's Designation:

Date Received: January 14, 2009

Subject: Two (2) Filling Lines

Date Issued:

Location: 1191 South Wheeling Road, Wheeling, Cook County

This permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of one (1) one-gallon filling line and one (1) five-gallon filling line pursuant to the above-referenced application. This permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This permit is issued based on the emission of Hazardous Air Pollutants (HAP) as listed in Section 112(g) of the Clean Air Act being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements of Section 112(g) of the Clean Air Act.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
2. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hour (8 lbs/hour) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart K shall apply only to photochemically reactive material.
3. This permit is issued based upon the source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing, 40 CFR 63, Subpart HHHHH. This is consequence of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
4. This permit is issued based upon the source not being subject to the requirements of 35 Ill. Adm. Code Part 218 Subpart AA (Paint and Ink Manufacturing). This is a result of the federally enforceable

production and operating limitations, which restrict a potential to emit to less than 25 tons per year and production to less than 1,892,705 liters (500,000 gallons) per calendar year of paint or ink formulations which contain less than 10% (by weight) water, and ink formulations not containing as the primary solvents water, Magie oil or glycol.

- 5. In the event that the operation of this facility results in an odor nuisance or any other nuisance due to process operating conditions, raw materials usage or any other cause, the Permittee shall take all appropriate and necessary actions, including but not limited to, changes in process conditions, raw materials, or installation of emission controls, in order to eliminate the nuisance.
- 6a. Operation of the latex paint and coating manufacturing equipment, cleaning operation, and storage tanks at this source (includes one 1-gallon filling line and one 5-gallon filling line) shall not exceed the following limits:

i. Production of latex paint and coatings:

Paint & Coating Production	
<u>(Gallons/Month)</u>	<u>(Gallons/Year)</u>
3,000,000	26,250,000

ii. VOM and HAP emissions:

VOM Emissions		Single HAP Emissions		Total HAP Emissions	
<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Tons/Mo)</u>	<u>(Tons/Yr)</u>
2.24	22.4	0.89	8.9	2.24	22.4

These limits are based on the maximum material usage and calculations using the method described in the Emission Inventory Improvement Program, Vol. II: Ch. 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, February 2005 for all paint and coating manufacturing and storage. These methods and practices are based on engineering methods and fundamental vapor/liquid equilibrium relationships, including Raoult's law and Daltons' law, assuming ideal gas behavior, and accounting for batch recirculation. Storage and cleaning is based on all tanks not storing solvent and non-solvent materials with vapor pressures greater than 0.1 psia at 60°F.

- b. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.89 tons/month and 8.9 tons/year of any single HAP and 2.24 tons/month and 22.4 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements of Section 112(g) of the

Clean Air Act and the NESHAP for Hazardous Air Pollutants:
Miscellaneous Coating Manufacturing, 40 CFR 63 Subpart HHHHHH.

7. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.
- 8a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
 - i. Production rate for the latex paint and coating manufacturing equipment (including the new filling lines) (tons/month and tons/year); and
 - ii. Monthly and annual VOM and HAP emissions from the latex paint and coating manufacturing equipment (including the new filling lines) with supporting calculations (ton/mo and ton/yr).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

9. Pursuant to 35 Ill. Adm. Code 218.637(a), upon request by the Illinois EPA, the owner or operator of an emission source which claims to be exempt from the requirements of 35 Ill. Adm. Code 218 Subpart AA shall submit records to the Illinois EPA within 30 calendar days from the date of the request which document that the emission source is in fact exempt from 35 Ill. Adm. Code 218 Subpart AA. These records shall include (but are not limited to) the percent water (by weight) in the paint or ink being produced and the quantity of Magie oil, glycol and other solvents in the ink being produced.
- 10a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.
- b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this permit, please contact Jocelyn Stakely at 217/782-2113.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:JRS:psj

cc: Region 1